1 2 3 4 5 6	Marc J. Randazza, Esq., Arizona Bar No. 027861 Randazza Legal Group 10620 Southern Highlands Pkwy, Ste. 110-45 Las Vegas, NV 89141 888-667-1113 305-437-7662 (fax) MJR@randazza.com Attorney for Plaintiff,	4	
7	LIBERŤY MEDIA HOLDINGS, LLC		
8	UNITED STATES DISTRICT COURT		
9	DISTRICT	OF ARIZONA	
10	Liberty Media Holdings, LLC) Case No. 11-CV-0280-PHX-LOA	
11	Plaintiff,	Declaration of Eric Gapp in Support of Supplement	
12	VS.))	
13	. 2.))	
14	Vinigay.com; Gustavo Paladeski; Vinicius Alves))	
15	Defendants.))	
16	D \$1\$mumis.))	
17	I, Eric Gapp, declare under penalty of	periury that:	
18	117	ellectual Property Management for Plaintiff Liberty	
19	Media Holdings (Liberty).		
20 2. As part of my duties, I regularly patrol the Internet for instances of pi		rly patrol the Internet for instances of piracy and	
21	actively participate in litigation against online pirates.		
22	3. As such, the following is based	•	
23	, C	e aware of the website, Vinigay.com, and conducted	
24	• • • • • • • • • • • • • • • • • • • •	covered the Works being displayed and distributed	
25		eos appearing on the Vinigay.com website appeared	
26	to be the copyrighted works of Plaintiff and o		
27	12 22 and copyrighted world of Figure and o		
28			
		1	

1	5. I made copies of specific web pages displayed on the Vinigay.com website,	,
2	including the Terms of Use, a true and correct copy of which is attached to this supplement as	3
3	Attachment A.	
4	6. I additionally researched the registration information for the website. A true and	l
5	correct copy of the registration information, showing the Registrar was Wild West Domains, was	3
6	filed as ECF Doc. 24-4.	
7	7. A true and correct copy of the Whois information showing the registrant as	3
8	Gustavo Paladeski was filed as ECF Doc. 1-2.	
9	8. The current Whois registration page shows that the vinigay.com website was shut	t
10	down for copyright infringement. A true and correct copy is attached to this Notice as	3
11	Attachment B.	
12	Signed on July 31, 2011 in San Diego, California.	
13	s/ Eric Gapp	
14	Eric Gapp	
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1	CERTIFICATE OF SERVICE
2	I hereby certify that the foregoing document was filed using this Court's CM/ECF system
3	on July 31, 2011. Service was made on Defendants by email pursuant to the Court's Order (ECF
4	No. 10).
5	Dated: July 31, 2011 Respectfully submitted,
6	s/ Marc Randazza Marc J. Randazza, SBN 269535
7	Randazza Legal Group
8	10620 Southern Highlands Pkwy, Ste. 110-454 Las Vegas, NV 89141 888-667-1113
9	888-667-1113 305-437-7662 (fax)
10	<u>mjr@randazza.com</u>
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	3 Declaration of Eric Gapp in Support of Notice of Supplemental Evidence